

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Tom Reed, et. al, )  
vs. Plaintiff(s), )  
Brex, Inc., et al. ) CIVIL NO. 17-292-NJR-GCS  
Defendant(s). )

**MOTION TO EXTEND PAYMENT DEADLINE**

Defendants Brex, Inc., d/b/a CarX, John Keeley and Kevin Floyd, by and through their counsel, Randall W. Slade of Franco Moroney Buenik, LLC for their Motion to Extend Payment Deadline, state as follows:

1. On April 18, 2019, the Court entered an Order awarding \$3,701.26 to Plaintiffs, to be paid by Defendants by May 3, 2019.

2. Counsel for Defendants was out-of-state and unavailable when the Order was issued and for much of the following two weeks, delaying the ability to respond and work out payment details. Defendants hereby request an additional 7 days to comply with the Order.

3. Counsel for Defendants has discussed the content of this Motion with Counsel for Plaintiffs, Mark Potashnick, by telephone and subsequent email with a copy to Counsel for Plaintiffs, Jack Daugherty. Plaintiffs' counsel have indicated no objection to the extension.

WHEREFORE, for all of the foregoing reasons, Defendants respectfully ask that the Court grant an additional seven days, until May 10, 2019, for compliance with the Court's April 18, 2019 Order.

Dated: May 3, 2019

Respectfully submitted,

\s\ Randall W. Slade  
One of the Attorneys for Defendants

Randall W. Slade  
**Franco Moroney Buenik, LLC**  
500 West Madison Street  
Suite 2440  
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(312) 469-1000

**CERTIFICATE OF SERVICE**

THE UNDERSIGNED, an attorney, hereby certifies that on the **3<sup>rd</sup>** day of **May 2019** a true and correct copy of **Defendants Motion to Extend Payment Deadline** was served upon counsel of record Mark Potashnick, Weinhause & Potashnick, 11500 Olive Blvd, Ste. 133, St. Louis, Missouri 63141, [markp@wp-attorneys.com](mailto:markp@wp-attorneys.com) and Jack R. Daugherty, Law Office of Jack Daugherty P.C., 112 Front Street, Alton, IL 62002, [jack@jackdaughertylaw.com](mailto:jack@jackdaughertylaw.com), by delivery via CM/ECF Filing System.

Dated: May 3, 2019

Respectfully submitted,

\s\ Randall W. Slade  
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